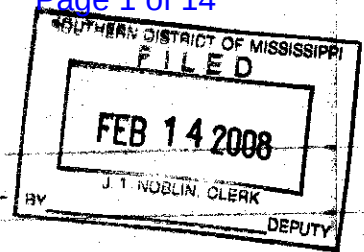


Complaint  
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UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

Jackson Division

JAMES H. STERN  
Plaintiff

Case No. 2:08cv33KS-MTP

42 USC § 1983 Jury Trial Demand

-VS-

CHRISTOPHER EPPS  
Mississippi Department of Corrections

1. Personal injury

American Correctional Association

2. Violation of State laws on Smoking

GT ENTERPRISE OF MS INC

3. Violation of ACA STANDARDS

AM SOUTH BANK

4. Violation of Constitutional Rights

HANCOCK BANK

5. Embezzlement

JIM HOO, ATTORNEY GENERAL MISSISSIPPI

6. Fraud

MYRICK JACKSON, DEPT AG MS

7. Money Laundering

GRANT HEDGEPEATH, DEPT AG MS

8. Perjury § 97-9-59

BARBARA DUNN, Circuit Clerk Hinds Co.

9. Obstruction of Justice

Does 1-20

10. Refusal to give certified copies  
of Papers § 97-11-17

DEFENDANTS

PLAINTIFF JAMES H. STERN, NOT A RESIDENT OF THE STATE OF MISSISSIPPI

BUT PRESENTLY IS INCARCERATED IN A STATE PRISON, SOUTHERN MISSISSIPPI CORRECTIONAL

INSTITUTION LOCATED AT P.O. BOX 1419 Leaksville, MS 39451. PLAINTIFF

HAS FILED A PETITION FOR HABEAS CORPUS RELIEF PURSUANT TO 28 USC § 2254

AND IT WAS DISMISSED WITHOUT PREJUDICE FOR FAILURE TO EXHAUST

AVAILABLE STATE REMEDIES WHICH ARE NOW IN THE PASSES. CASE NO. 3:07-CV-

317-WHB-LRA. ALSO PLAINTIFF HAS A 42 USC § 1983 FILED BEFORE HIS

CONVICTION TO THE MISSISSIPPI DEPARTMENT OF CORRECTIONS # 3:07-CV-398-

OPT-JCS STILL IN LITIGATION. THERE ARE NO OTHER CASES.

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- 1 CHRISTOPHER EPPS, Commissioner  
MISSISSIPPI DEPARTMENT OF CORRECTIONS Located at 723 NORTH
- 2 PRESIDENT STREET Jackson, MS 39202 is Sued in its official
- 3 and supervisory capacity set in motion a series of event it new
- 4 about or should have new about that led to the injuries
- 5 and damages of Plaintiff.
- 6
- 7 AMERICAN CORRECTIONAL ASSOCIATION Located at 4380 FORBES BLVD.  
20706
- 8 LANHAM, MARYLAND and as a Accreditor in the state of MISSISSIPPI
- 9 doing business also located at 723 NORTH PRESIDENT STREET, JACKSON,
- 10 MS 39202 is sued in its official and supervisory capacity
- 11 set in place a series of events it new about or should have new
- 12 about that led to the injuries and damages of Plaintiff.
- 13
- 14 GIT ENTERPRISE Located at P.O. Box 1779 Brandon, MS 39043
- 15 and as a vendor of the MISSISSIPPI DEPARTMENT OF CORRECTIONS is also
- 16 located at 723 NORTH PRESIDENT STREET, JACKSON, MS 39202 is sued in its
- 17 official and supervisory capacity set in place a series of events it
- 18 new about or should have new about that led to the injuries and
- 19 damages of Plaintiff.
- 20
- 21 HANCOCK BANK Location NOT FULLY KNOWN BUT IS IN GULFPORT,
- 22 MS is Sued in its official and supervisory capacity.
- 23
- 24 AM SOUTH BANK Location NOT FULLY KNOWN BUT IS DOING BUSINESS
- 25 IN JACKSON, MS 39202 BANK ABA # 055305436 is sued in
- 26 its official and supervisory capacity set in motion a series of events
- 27 it new about or should have known about that led to the injuries
- 28 and damages of Plaintiff.

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1 JIM HOOD ATTORNEY GENERAL, MYRICK JACKSON DEPT. AG, GRANT  
 2 HEDGECOCK DEPT. AG, LOCATED AT 802 NORTH STATE STREET  
 3 SUITE 303 JACKSON, MS 39225 IS SUED IN THEIR OFFICIAL AND  
 4 SUPERVISORY CAPACITY, SET IN PLACE A SERIES OF EVENTS THEY KNEW ABOUT  
 5 OR SHOULD HAVE KNOWN ABOUT THAT LEAD TO THE INJURIES AND DAMAGES OF PLAINTIFF.

6  
 7 BARBARA DUNN CIRCUIT CLERK HINDS COUNTY LOCATED AT 316 SOUTH PRESIDENT  
 8 STREET, JACKSON MS 39201 IS SUED IN HER OFFICIAL AND SUPERVISORY  
 9 CAPACITY SET IN MOTION A SERIES OF EVENTS SHE KNEW ABOUT OR SHOULD  
 10 HAVE KNOWN ABOUT THAT LEAD TO THE INJURIES AND DAMAGES OF PLAINTIFF.

### 11 ISSUE PROCESS

12 PLAINTIFF ASK FOR THE UNITED STATES DISTRICT CLERK ISSUE  
 13 SUMMONS TO ALL NAMED DEFENDANTS AND A COPY OF THE  
 14 COMPLAINT BE ATTACHED AND THE UNITED STATES MARSHAL SERVE  
 15 THE SAME PURSUANT TO 28 U.S.C. § 1915(d) OR WHAT EVER IS PROPER.

16  
 17 DEFENDANT AM SOUTH FULL LOCATION IN JACKSON MISSISSIPPI 39202  
 18 A BANK IS NOT KNOWN AND IT'S FULL ADDRESS IS ASKED TO BE DISCOVERED  
 19 AND FOR THEM TO BE SERVED THERE.

20  
 21 DOES 1-20 PROPER NAMES AND ADDRESSES ARE UNDETERMINED  
 22 AT THIS TIME WILL BE ADDED AS THEY BECOME KNOWN.

### 23 FIRST STATEMENT

24  
 25 DEFENDANTS HAVE NO DEFENCE FOR WHICH A GOOD FAITH LEGAL AND/OR  
 26 FACTUAL BASIS EXISTS PLAINTIFF ASSERTING HIS CONSTITUTIONAL RIGHT  
 27 TO A JURY TRIAL ON ALL STATE LAW, FEDERAL LAW AND ALL  
 28 CAUSES BROUGHT IN THIS COMPLAINT.

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## SECOND STATEMENT

THE COMPLAINT STATE CLAIMS UPON WHICH RELIEF CAN BE GRANTED.

## THIRD STATEMENT

DEFENDANTS HAVE ILLEGALLY DENIED PLAINTIFF THE RIGHT TO COMPLY WITH THE MANDATORY PROVISIONS OF MISSISSIPPI'S TORT CLAIM ACT AS CODIFIED IN MISSISSIPPI CODE ANNOTATED § 11-46-1 ET SEQ... PLAINTIFF IS BEING KEPT FROM COMPLYING WITH MANDATORY NOTICE REQUIREMENTS AS DETAILED IN THE MANDATORY MISSISSIPPI TORT CLAIMS ACT. KEEPING HIM FROM THE LAW LIBRARY HAS ENABLED THEM TO USE THEIR INMATE LEGAL ASSISTANCE PROGRAM TO WRONGLY DIRECT PLAINTIFF FROM NEEDED FORMS TO FILE. THERE FOR AS A MATTER OF LAW PLAINTIFF HAS SATISFIED ALL REQUIREMENTS, AND HERE NOW SUE THE ADMINISTRATIVE PROGRAM.

## FOURTH STATEMENT

DEFENDANTS BREACHED A DUTY OWED TO THE PLAINTIFF AND VIOLATED HIS RIGHTS AND PRIVILEGES THEREFORE THEY ARE LIABLE FOR DAMAGES.

## FIFTH STATEMENT

THE MATTER SET FORTH IN THIS COMPLAINT RISES TO THE LEVEL OF A CONSTITUTIONAL VIOLATION AND SUCH MATTERS ARE PROPERLY BEFORE THIS COURT.

## SIXTH STATEMENT

DEFENDANTS POSSES NO IMMUNITY HEREIN FROM SUIT AND/OR LIABILITY AND/OR DAMAGES THEY ARE SUED IN THE OFFICIAL AND SUPERVISORY CAPACITY.

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## SEVENTH STATEMENT

DEFENDANTS COMMITTED ACTS OR OMISSION WHICH CAUSED INJURY,  
DAMAGE AND DEPRIVATION TO THE PLAINTIFF AND DEFENDANT IS  
THEREFORE LIABLE IN DAMAGES.

## EIGHTH STATEMENT

AS A MATTER OF LAW, THE PLAINTIFF IS ENTITLED TO RELIEF FROM DEFENDANT.

## NINTH STATEMENT

THESE MATTERS SET FORTH IN THE COMPLAINT ARE NOT TIME BARRED BY  
THE APPLICABLE STATUTE OF LIMITATIONS.

## TENTH STATEMENT

PLAINTIFF HEREBY SPECIFICALLY PLEADS THAT ALL ALLEGATIONS OF THE COMPLAINT  
ARE TRUE AND HE IS NOT GUILTY OF EITHER CONTRIBUTORY NEGLIGENCE  
OR AFFIRMATIVE CONDUCT IN CONNECTION WITH THE EVENTS COMPLAINED.

## ELEVENTH STATEMENT

PLAINTIFF'S ALLEGED INJURIES ARE FACTUAL AND HARM CAUSED WAS  
FORESEEABLE, BY PERSONS, FORCES OR ENTITIES FOR WHOM THE DEFENDANT  
IS LIABLE AND RESPONSIBLE, AS SUCH BEING INTERVENING, SUPERSEDING  
CAUSES, BREAKING CAUSAL LINK TO THIS DEFENDANT.

## TWELTH STATEMENT

AT ALL TIMES, DEFENDANTS DID NOT ACT IN GOOD FAITH OR RELIANCE UPON  
THEN EXISTENT LAW AND IS THEREFORE NOT ENTITLED TO QUALIFIED IMMUNITY  
OR A SPECIAL GOOD FAITH DEFENSE



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### THIRTEENTH STATEMENT

Plaintiff is suing Defendants for an inadequate remedy program, one they violate all their own established procedures and statute of limitations which in this case has caused actual physical pain and injuries to Plaintiff and irreparable harm. Defendants carry out remedy program to obstruct justice and carry out other illegal acts that block inmates from the court. Evidence will show this is not a isolated incident.

### FOURTEENTH STATEMENT

Defendants at all times complained of, acted in bad faith, with total malice, reckless disregard, and deliberate indifference, malicious intent with evil motives and are guilty of wrongful or tortious conduct.

### FIFTEENTH STATEMENT

Additionally damages, losses and deprivation to Plaintiff was caused by official policy, practices, customs of Defendants. Plaintiff loss, injuries and damages is the result of the official Governmental Policy, custom or practices attributable to Defendants. Further more Defendant is guilty of deliberate abuse of Antiholent Government Power and had no psychological justification for all actions undertaken by them.

### SIXTEENTH STATEMENT

Plaintiff claim for Punitive Damages must be sustained because he can prove every element of such claims Beyond a Reasonable doubt.

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## SEVENTEENTH STATEMENT

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Plaintiff is under imminent danger of serious physical injury and has all ready under gone pain from torturous treatment, state his rights to proceed under 28 U.S.C. § 1915.

## EIGHTEENTH STATEMENT

This case being in part a whistle blower case on millions of identified dollars embezeled in a fraudulent manner. Personal identifiers are necessary and relevant in the course of litigation and will be stated in pleadings and other court-filed documents, including exhibits, in such redacted format as may be appropriate under the circumstances. 44 U.S.C. §§ 3500 et seq (B.) Redacted personal identifiers (E.) Redacted sensitive information and data.

CHRISTOPHER EPPS  
Mississippi Department of Corrections, American Correction Association,  
GIT Enterprise of MS INC., are responsible for personal injuries  
Plaintiff have sustained. Plaintiff have been placed on 4 different  
kinds of pain pills for migrain headaches since July 10, 2007  
and Plaintiff has chass, thought pain that's unbearable and untreatable  
do to the constant source of his injuries, his levels of second hand smoke  
from tobacco, his levels of carbon dioxide and a lack of oxygen. Plaintiff  
is illegally subjected to the and nicotine in a enclosed area for 23 hours  
a day with a constant burning wick made of toilet paper. There  
are 100 people per housing unit and 92 smoke at all times in  
this state building, sleeping areas, TV areas and rest room/shower area.  
even correctional officers light up and smoke as they walk through at  
cort time. The tobacco is sold strictly for profit and packaged  
exclusively for GIT Enterprise of MS INC. GIT Enterprise has

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1 A exclusive contract with MISSISSIPPI DEPARTMENT OF CORRECTIONS  
 2 TO SELL PRODUCTS FOR A PROFIT AT THE EXPENSE OF PLAINTIFFS HEALTH  
 3 WHICH IS PROTECTED UNDER STATE LAWS ON SMOKING, ACA STANDARDS  
 4 ON SMOKING AND CONSTITUTIONAL RIGHTS, MDOC VIOLATED SMOKING  
 5 LAWS FOR PROFIT AND TORTIOUS PRACTICES. ACA IGNORE MDOC ILLEGAL  
 6 ACTIONS VIOLATING THEIR APPROVED NONPROFIT STATUTES CHARTER,  
 7 GT ENTERPRISE SUPPLIES MDOC WITH PRODUCT FOR PROFIT, TO THEM  
 8 SELVES AND MDOC AND IGNORE ILLEGAL ACTIONS TO KEEP EXCLUSIVE DEAL.  
 9 THESE ILLEGAL ACTIONS ADD TO EXISTING MEDICAL PROBLEMS OF PLAINTIFF  
 10 AND PLAINTIFF HAS BEEN DOCUMENTED AS MEDICAL CLASS 3 AND NO PROVISIONS  
 11 ARE TAKEN TO ACCOMMODATE HIM, AMERICAN DISABILITY ACT (ADA)

12 CHRISTOPHER EPPS  
 13 MISSISSIPPI DEPARTMENT OF CORRECTIONS AND AMERICAN CORRECTIONAL ASSOCIATION  
 14 DEFENDANTS, VIOLATE PLAINTIFF CONSTITUTIONAL RIGHT TO HAVE ACCESS TO THE  
 15 COURTS AND BEING PROSECUTED ACCESS TO THE LAW LIBRARY. THE ACA HAS  
 16 APPROVED THIS AND ALL MDOC INSTITUTIONS STATING THEY MEET ALL REQUIREMENTS,  
 17 A LAW LIBRARY IS ONE. THE INMATE LEGAL ASSISTANCE PROGRAM IS  
 18 ONLY FOR INMATES THAT CANT MAKE MEANINGFUL USE OF THE LAW  
 19 LIBRARY NOT TO REPLACE IT. THE INMATE LEGAL ASSISTANCE PROGRAM  
 20 STEER AND DIRECT INMATES IN THE WRONG DIRECTION ON PURPOSE  
 21 AND WITH HOLD MATERIALS PLAINTIFF IS INITIATED TO. THESE DEFENDANTS  
 22 ALSO VIOLATE THE ADMINISTRATIVE REMEDY PROGRAM IN ALL AREAS  
 23 TO BLOCK THE COMPLAINTS OF PLAINTIFF AND ALL OTHER INMATES. DISCOVERY  
 24 WILL SHOW THIS VERY SIMPLY. THE LEGAL MAIL PROCEDURES BY THESE  
 25 TWO ARE CARRIED OUT IN A HIGHLY ILLEGAL FASHION WHICH WILL BE  
 26 PROVEN BEYOND A SHADOW OF A DOUBT.



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1 CHRISTOPHER EPPS  
 2 MISSISSIPPI DEPARTMENT OF CORRECTIONS, AMERICAN CORRECTIONAL ASSOCIATION,  
 3 GT ENTERPRISE OF MS INC, AND AM SOUTH BANK DEFENDANTS, ALL  
 4 POTENTIALLY IN EMBEZZLEMENT OF INMATES MONEY, FRAUD AND MONEY  
 5 LAUNDERING, PLAINTIFF HAVE IDENTIFIED ACTUAL BANK ACCOUNTS THIS  
 6 MONEY IS BEING DEPOSITED AND WITHDRAWN, THIS IS BEING DONE  
 7 IN THE AMOUNTS OF \$6.00 - \$20.00 AT A TIME PER INMATE'S  
 8 ACCOUNT MULTIPLYING THAT TIMES 8000 - 24000 INMATES GIVING  
 9 A YEARLY THEFT OF ABOUT \$6,000,000 (SIX MILLION - EIGHTEEN MILLION)  
 10 PLAINTIFF FILES THIS CLAIM UNDER THE WHISTLE BLOWERS LAWS  
 11 THAT APPLY AND WITH PLAINTIFFS KNOWLEDGE OF ACTUAL BANK ACCOUNTS  
 12 INVESTIGATORS WILL BE ABLE TO AUDIT AND CONFIRM CHARGES.

13 JIM HOOD ATTORNEY GENERAL, MYRICK JACKSON DEPT. AG, AND GRANT  
 14 HODGEPETH DEPT. AG DEFENDANTS ALL COMMITTED PERJURY IN PLAINTIFF  
 15 CRIMINAL CASE TO FORCE A CONVICTION AND DO DAMAGE TO PLAINTIFF,  
 16 WHILE CRIMINAL MATTER IS GOING TO STATE SUPREME COURT BUT CHOICE  
 17 OF FEDERAL COURT, INSTRUCTING STATE REMEDYS BE EXHAUSTED, CIVIL  
 18 VIOLATION ARE ALL REMAY ESTABLISHED. EVIDENCE IS WELL ESTABLISHED.  
 19 THIS PERJURY WAS A OBSTRUCTION OF JUSTICE.

20  
 21 BARBARA DUNN CIRCUIT CLERK HINDS COUNTY DEFENDANT REFUSED  
 22 TO GIVE CERTIFIED COPIES OF PAPERS, PAPERS IN THIS CLAIM WAS  
 23 A MOTION FOR DISMISSAL, SHE UNDER COURT RECORD ADMITTED  
 24 TO HOLDING IT FOR ABOUT 4 MONTHS AND NEVER FILING ORIGINAL  
 25 MOTION BY PLAINTIFF IN THIS CASE, A DEFENDANT IN CRIMINAL CASE.  
 26 AFTER 4 MONTHS SHE HAD IT IN OPEN COURT DISPLAYING IT SAYING  
 27 SHE DIDNT THINK THE JUDGE WANTED IT FILED.

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FIRST Cause OF ACTION

PERSONAL INJURY

Plaintiff Has sustained injuries and damages do to the illegal, unlawful actions of Defendants. Migraine Head aches, Throat Pain, Chest Pain, Eyes in Pain, lack of sleep, Heart Problems and Emphysema Are some of my injuries.

SECOND Cause OF ACTION

Violation of State laws on Smoking in State Buildings.

Defendants Do NOT Follow any of the established laws on not smoking.

THIRD Cause OF ACTION

Violation of American Correctional Association Standards.

Defends Violate All Standards under there Accreditations on, Smoking, Administrative Remedy Program, Access to Courts, Access to the Law Library, and illegal mail procedures on legal mail.

FOURTH Cause OF ACTION

Violation of Constitutional Rights of a Inmate.

Defendants actions are tortious, cruel and unusual, the First Amendment and others are violated daily to do harm and block inmates access to the court system.

FIFTH Cause OF ACTION

EMBEZELMENT

Defendants Take money of inmates from there trust account established by MDOC and still it, and attempted to cover up there actions on statements given to inmates.

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## SIX Cause OF ACTION

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## FRAUD

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DEFENDANTS COMMIT FRAUD IN ILLEGALLY ESTABLISHING ACCOUNTS

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FOR INMATES AND SHOWING FUNDS NOT AVAILABLE WHEN THEY

5

SHOULD BE AND USE ~~THE~~ THOSE FUNDS FOR UNAUTHORIZED PURPOSES.

6

7

## SEVENTH Cause OF ACTION

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## MONEY LAUNDERING

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DEFENDANTS TAKE STOLEN MONEY AND LAUNDER IT THROUGH BANK

10

ACCOUNTS IDENTIFIED AND THE MONEY IS USED FOR ILLEGAL PURPOSES

11

AND NO TAXES IS EVER PAID ON THEM.

12

13

## EIGHT Cause OF ACTION

14

## PERJURY § 97-9-59

15

DEFENDANTS UNDER OATH LIED AND PERJURED THEM

16

SELVES AT THE HEARING OF PLAINTIFF THAT LEAD TO HIS INJURIES

17

AND DAMAGES.

18

19

## NINTH Cause OF ACTION

20

## OBSTRUCTION OF JUSTICE

21

DEFENDANTS IN ALL ALLEGATIONS MADE AGAINST THEM OBSTRUCTED

22

JUSTICE AND IT LED TO THE INJURIES AND DAMAGES ON PLAINTIFF.

23

24

## TENTH Cause OF ACTION

25

REFUSAL TO GIVE CERTIFIED COPIE OF PAPER § 97-11-17

26

DEFENDANT FAILED TO PERFORM DUTIES WITH CRIMINAL INTENT LEADING

27

TO THE DAMAGES AND INJURIES OF PLAINTIFF.

28

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## Administrative Remedies

Plaintiff have been denied his right to file a tort claim as codified in Mississippi code § 11-46-1 et seq... The forms and codes Plaintiff requested were denied and told to him they don't exist. This is able to happen do to the law library not being available to pro se inmate to do his own reliable research. Plaintiff filed two (ARPs) The Mississippi Department of Corrections have in place and the first one never came back with a response, at the time of inmate hand his ARP complaint in he is denied a copy of it which goes against the rights of inmate. (see inmate hand book) also there is no receipt or case number given to the claim for inmate to prove he filed it, and on a certain day. The day filed is important because the ARP process has a 90 statute of limitations to be complete from start to finished unless an extension is granted. The institution chose to ignore my first one and with there tracking violations they got away with it. The second ARP is in the same situation as the first. My discovery will unveil thousands of such violations and my depositions will confirm discovered documents. The Plaintiff has suffered and is suffering irreparable harm, harm that unless this court intervenes now, will cause his life, medical facts well documented. Prison Plaintiff is having daily is cruel and unusual punishment. A Emergency Injunction is part of this request for relief.

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## PRAYER FOR RELIEF

PLAINTIFF JAMES H. STERN PRAY FOR RELIEF AS STATED.

1. FOR PERSONAL INJURY CLAIM \$1,000,000 (ONE MILLION DOLLARS) FOR ACTUAL DAMAGES.
2. FOR VIOLATION OF STATE LAWS ON SMOKING, INJUNCTIVE RELIEF BE GRANTED. ALL SMOKING IN LIVING AREAS OF INMATES BE STOPPED. NO MORE SMOKING BE PERMITTED BY OFFICERS OR INMATES IN HOUSING AREAS. AND ALL ESTABLISHED LAWS BE HONORED, AND PAYED FOR SUFFERING & PAIN.
3. FOR VIOLATION OF ACA STANDARDS, INJUNCTIVE RELIEF BE GRANTED. ALL ACA STANDARDS BE REVIEWED ON SMOKING, ACCESS TO COURTS, ACCESS TO LAW LIBRARY, ARP, LEGAL MAIL PROCEDURES AND A ORDER BE GIVEN FOR MDOC TO COMPLY WITH THEM. INMATES, PLAINTIFF BE GIVEN ACCESS TO A PHYSICAL ACTUAL LAW LIBRARY HE CAN GO INTO AND HAVE ACCESS TO ALL LAW BOOKS, STATUTES, POLICIES, TYPE WRITERS AND ALL FORMS NEEDED. THE ARP PROCESS GIVE INMATES A FILING NUMBER FROM THE DAY THEY FILE COMPLAINT AND MDOC COMPLY WITH 90 DAY STATUTE OF LIMITATION OR FACE PENALTYS FOR VIOLATION, INMATES BE GIVEN SAME RIGHT TO CERTIFIED MAIL IN SENDING IT, AND CERTIFY WITH RETURN, AND PLAINTIFF PAYED FOR SUFFERING AND PAIN CAUSED.
4. FOR CHARGES OF EMBEZZLEMENT, FUND AND MONEY LAUNDERING PLAINTIFF RECEIVE ALL PERCENTAGES AS DESCRIBED UNDER THE WHISTLE BLOWERS LAW. AND A OUT SIDE INDEPENDENT ACCOUNTING FIRM OF PLAINTIFF CHOSEN BE ALLOWED TO AUDIT ALL RECORDS OF EVERY INMATES ACCOUNT BY THEIR MDOC NUMBER LINK TO A TRUST ACCOUNT. ALSO A INTERVIEW WITH ALL INMATES ON THE SUBJECT OF THERE TRUST ACCOUNT BE GRANTED, AND PLAINTIFF BE PAYED FOR SUFFERING AND PAIN CAUSED.



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5. For violation of PERJURY, OBSTRUCTION OF JUSTICE AND REFUSAL TO GIVE ~~THE~~ CERTIFIED COPIES, DEFENDANTS BE PUNISHED BY ESTABLISHED LAWS AND PLAINTIFF BE PAID FOR SUFFERING AND PAIN.

6. Because DEFENDANTS BREACHED A DUTY OWED TO THE PLAINTIFF AND VIOLATED HIS RIGHTS AND PRIVILEGES AND PLAINTIFF IS NOT GUILTY OF EITHER CONTRIBUTORY NEGLIGENCE OR AFFIRMATIVE CONDUCT IN CONNECTION WITH EVENTS COMPAINED. AND BECAUSE DEFENDANTS ACT IN BAD FAITH AND IGNORED THEN EXISTENT LAW, ACTED WITH TOTAL MALICE, RECKLESS DISREGARD AND DELIBERATE INDIFFERENTS, VIOLENT INTENT WITH EVIL MOTIVES AND ARE GUILTY OF WRONGFUL AND TORTIOUS CONDUCT PLAINTIFF ASK \$20,000,000 (twenty million) FOR PUNITIVE DAMAGES.

7. PLAINTIFF ALSO ASK FOR A ADDITIONAL \$10,000,000 FOR SUFFERING AND PAIN. PLAINTIFF AT ALL TIMES HAD AND HAVE NO ACCESS TO THE LAW LIBRARY, LAW BOOKS, STATUES, POLICIES, TYPWRITERS OR LEGAL FORMS MAKING HIS EXPERIENCE IN ALL THIS COMPLETELY, MENTALLY, PAINFUL. PLAINTIFF SUFFERED TO GET THIS DONE UNDER SUCH ILLEGAL SUPPRESSIVE CONDITIONS.

AND ALL LEGAL FEES AND BILLABLE HOURS TO BE PAID BY DEFENDANTS.

ALL THE ABOVE IS TRUE AND CORRECT UNDER THE OATH OF PERJURY

JAMES H. JOHNSON

PRO SE.

1-21-08